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Filing date: **07/02/2018**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91241898
Party	Defendant CKL Holdings N.V.
Correspondence Address	JONATHAN GRANT MORTON MORTON & ASSOCIATES LLP 246 WEST BROADWAY 4TH FLOOR NEW YORK, NY 10013 Email: jm@moas.com
Submission	Answer
Filer's Name	Jonathan G. Morton
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Date	07/02/2018
Attachments	Answer CINGULAR.pdf(223819 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

AT&T INTELLECTUAL PROPERTY II, L.P., AT&T  
MOBILITY L.L.C. and NEW CINGULAR WIRELESS  
PCS, L.L.C.,

Opposers,

v.

CKL HOLDINGS N.V.,

Applicant.

Opposition No. 91/241,898

Serial No. 87/400,204

Mark: CINGULAR

Filing Date: April 05, 2017

Publication Date: February 20, 2018

**APPLICANT’S ANSWER TO THE NOTICE OF OPPOSITION**

CKL Holdings N.V. (“Applicant”), a naamloze vennootschap company duly organized and existing under the laws of Belgium, with a principal place of business at Leeuwenstraat 4, Antwerpen, Belgium 2000, by and through its counsel of record, Morton & Associates LLP, answers AT&T Intellectual Property II, L.P., AT&T Mobility L.L.C. and New Cingular Wireless PCS, L.L.C.’s (“Opposers”) Notice of Opposition as follows:

**FACTUAL BACKGROUND REGARDING OPPOSER AND ITS MARKS**

1. Answering Paragraph 1 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
2. Answering Paragraph 2 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
3. Answering Paragraph 3 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained

therein and accordingly denies the same.

4. Answering Paragraph 4 of the Notice of Opposition, Applicant admits the allegations contained therein.
5. Answering Paragraph 5 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
6. Answering Paragraph 6 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
7. Answering Paragraph 7 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
8. Answering Paragraph 8 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same, except Applicant admits the existence of U.S. Application Serial Numbers: 86/481,025; 86/481,044; 86/877,203; and 86/903,169.
9. Answering Paragraph 9 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
10. Answering Paragraph 10 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.

11. Answering Paragraph 11 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
12. Answering Paragraph 12 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
13. Answering Paragraph 13 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
14. Answering Paragraph 14 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
15. Answering Paragraph 15 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
16. Answering Paragraph 16 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
17. Answering Paragraph 17 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
18. Answering Paragraph 18 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained

therein and accordingly denies the same.

19. Answering Paragraph 19 of the Notice of Opposition, Applicant admits the allegations contained therein.
20. Answering Paragraph 20 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
21. Answering Paragraph 21 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
22. Answering Paragraph 22 of the Notice of Opposition, Applicant denies the allegations contained therein.
23. Answering Paragraph 23 of the Notice of Opposition, Applicant does not have sufficient knowledge or information to form a belief as to the allegations contained therein and accordingly denies the same.
24. Answering Paragraph 24 of the Notice of Opposition, Applicant denies the allegations contained therein.
25. Answering Paragraph 25 of the Notice of Opposition, Applicant denies the allegations contained therein.
26. Answering Paragraph 26 of the Notice of Opposition, Applicant denies the allegations contained therein.
27. Answering Paragraph 27 of the Notice of Opposition, Applicant denies the allegations contained therein.
28. Answering Paragraph 28 of the Notice of Opposition, Applicant denies the

allegations contained therein.

29. Answering Paragraph 29 of the Notice of Opposition, Applicant denies the allegations contained therein.

30. Answering Paragraph 30 of the Notice of Opposition, Applicant denies the allegations contained therein.

31. Answering Paragraph 31 of the Notice of Opposition, Applicant denies the allegations contained therein.

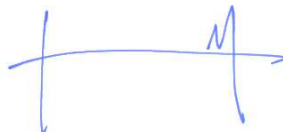
**AFFIRMATIVE DEFENSES**

Applicant reserves the right to rely on such other and further defenses as may be supported by facts to be determined through comprehensive discovery and to amend its Answer accordingly to assert such defenses.

**WHEREFORE**, Applicant respectfully requests that the Trademark Trial and Appeal Board dismiss the Notice of Opposition, dated June 19, 2018, with prejudice and permit Application Serial No. 87/400,204 to proceed to registration.

Dated: July 2, 2018

**Morton & Associates LLP**



By: \_\_\_\_\_  
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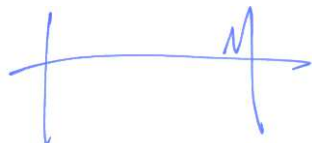
**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing ANSWER TO THE NOTICE OF OPPOSITION, dated July 2, 2018, has been served on Opposers' Attorney of Record by e-mail at the following addresses:

Jeffrey M. Becker, Esq.

jeff.becker@haynesboone.com

Dated: July 2, 2018

  
By: \_\_\_\_\_  
Jonathan G. Morton, Esq.